

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano,
Plaintiff,

v.

The City of Nashua, *et al.*,
Defendants.

Civil Action No. 1:22-cv-00326-LM

**DEFENDANT KIMBERLY KLEINER'S ASSENTED-TO MOTION FOR LEAVE TO
EXCEED PAGE LIMIT FOR HER MEMORANDUM OF LAW IN SUPPORT OF HER
MOTION FOR SUMMARY JUDGMENT**

Defendant Kimberly Kleiner ("Kleiner") brings the within assented-to motion to file a brief in excess of that permitted by Fed. R. Civ. P. 56 and L.R. 56.1, and as grounds therefore states as follows:

1. The Complaint in this matter consists of 198 paragraphs and 67 pages. The allegations span an eight year period of time. Plaintiff seeks a multitude of relief.
2. Defendant Kleiner requires in excess of 25 pages to fully brief the issues relevant to her summary judgment motion which is filed contemporaneously with the within motion. Defendant Kleiner seeks judgment on all counts in her favor and the memo of law discusses several legal theories that justify the relief requested.
3. Defendant Kleiner seeks leave to file a memorandum of law up to 30pages.
4. All Counsel for Plaintiff assent to the requested relief pursuant to LR 7.1(c).
5. No party will suffer undue prejudice by extending the 25 page limit under the Rules, nor will the granting of this motion result in undue delay of this matter.

WHEREFORE, Defendant Kleiner respectfully requests this Honorable Court:

A. Grant the within motion;

B. Permit Kleiner to file a memo of law in support of summary judgment of 30 pages; and

C. For such other just relief.

Kimberly Kleiner
By her attorneys,
FRIEDMAN FEENEY, PLLC,

Date: May 30, 2024

By: /s/ Dona Feeney
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served through the court's electronic filing system on to all counsel or parties of record.

Date: May 30, 2024

By: /s/ Dona Feeney
Dona Feeney